March 22, 2004

Steve Bulthuis
400-136th Avenue
Suite 416
Holland, Michigan 49424

Dear Steve,

Thank you for inviting me to comment on MACC's long-range transportation plans. I will not be able to attend your open house on March 30 because of hip surgery on March 23rd. Therefore, I am submitting these written comments.

I feel I represent many citizens of Holland, state and nation wide traveling public, and it seems to me MDOT needs to look at the US-31 bypass with those citizens in mind. My comments will relate to two parts of the roadway, the first section runs from 32nd Street north to M21. This is the section of US-31 that needs attention YESTERDAY in my opinion. The second section of US-31 that should be addressed runs from James Street to New Holland Street, where it will join up with 120th Avenue and continue to the new Grand Haven bridge. With the limited amount of highway funds available these sections should have first priority. The present US-31 is already a 'freeway' from Lincoln to 32nd St. and from 8th St. to James Street.

MDOT states on page 1-1[1] of the DEIS report "The purpose of and need for the US-31 study area is to reduce traffic congestion and improve safety for the traveling public." Also, on page 1-2[2] it states "in the vicinity of US-31." MDOT tried to do that at the present US-31 location, then suggested 120th Avenue, then 112th Avenue. Each time the City of Holland rejected those ideas saying in effect "we don't want this thing in our back yard." MDOT then moved the bypass location east of Zeeland. Is this what MDOT meant when it said "in the vicinity of the present US-31"? This is seven miles east of the present US-31. By MDOT's estimation, stated in DEIS 5-107[3], this would divert only 18% off the present US-31 route because it's so far out of the way.

[1] DEIS #1-1
[2] DEIS #1-2
[3] DEIS #5-107

However MDOT has planned the bypass around Zeeland and is going to add another North/South lane to the present US-31 location with a narrow boulevard design. Just by adding another lane will not reduce all the fender benders. We who live in the area are familiar with the two North /South roads, US-31 and Waverly, which are within a half mile of each other, and between the two roads, they have ten intersections between 32nd Street north to M21. Over the last eight years these intersections are in the top ten crash intersections in the entire city of Holland.[4] MDOT's plan to add one North lane and one South lane to the present US-31 does not do enough to make these roadways safer.[5]

Why waste precious farmland moving the freeway East of Zeeland then to the intersection of 120th Avenue and New Holland Street, when the present US-31 location has the right of way land already? You save money and land. What is MDOT thinking? A design change is needed to make the road safer and that means an URBAN freeway on the present available right of way.

I agree with the DEIS report Alternate A on page 5-106[6] and 5-107[7], and 5-30[8], except it should be an URBAN freeway not a rural freeway. MDOT, or more precisely Jeff Saxby (the project director), proposed a rural freeway. This would devastate the business community west of the present US-31. Where else has MDOT put a rural freeway through the business section of a city; this would be obnoxious. To relate how bad it is, Tom Williams, a designer with MDOT, told Jeff "service roads were not needed," but Jeff said, "put them in anyway". This would consume more business land. Jeff wanted to make the Alternative A unacceptable to the Holland business sector so Holland would have its way and build a freeway around Zeeland. This is criminal! On page 5-106 even with a rural freeway:

> "Alternative A has the highest measure of effectiveness in each category. The cost-effectiveness analysis shows that the added expense associated with the right-of-way acquisition and the construction of Alternative A is worth the additional benefit derived from the superior operational characteristics of Alternative A. Alternative A, the freeway on existing alignment, provides improved travel time and reduced potential for accidents to all the users of US-31 (rather than only those who would divert to a bypass under other freeway alternatives)."

[4] DEIS #2-11
[5] DEIS #2-8
[6] DEIS #5-106
[7] DEIS #5-107
[8] DEIS #5-30

The Mayor of Holland has on numerous times related to MAAC members how the city of Holland has spent the most money to improve the intersection of 16th St. and Waverly Road then any other intersection, and yet it has the highest number of accidents in the past eight years. By not planning ahead for future growth the intersection had to be rebuilt a second time, from three to five lanes. MDOT is making the same mistake by not upgrading US-31 freeway right the first time. If the City of Holland and MDOT were interested in safety and reducing congestion they would build a three lane (North and South) URBAN freeway which by MDOTs own numbers can move two to three times more traffic.

It's time for MDOT to do what is right for the public whether it be locals going to work or vacationers traveling to see our beautiful Lake Michigan shoreline. The selfish desires of the City of Holland come second to the majority of the people. I am aware of 'Home Rule' but the Michigan Supreme Court has come to the conclusion "MDOT and the State Transportation Commission may override any local disapproval."[9]

We don't need a new study since the DEIS points to all the advantages of Alternative A (to build on the present alignment), but MDOT has chosen to ignore their own study.

Let's move on to what is right!!
Sincerely,

Tom Vander Kuy

Tom Vander Kuy

cc: Governor Jennifer M. Granholm;
Gloria Jeff, MDOT Director

[9] Department of Attorney General, April 14, 2000

SECTION 1: SUMMARY

1.0 DESCRIPTION OF THE PROPOSED PROJECT

US-31 is a principal arterial on the National Highway System serving north/south traffic along the Lake Michigan shoreline. US-31 from South Bend, Indiana to the Mackinac Bridge is roughly 460 km (390 miles) and provides access to more than fifteen state parks, along with hundreds of tourist-oriented businesses and other recreational opportunities. US-31 is the primary commercial, commuter, and tourist route for both long distance travelers and local Holland to Muskegon trips. US-31 has been identified as part of Michigan's "Priority Commercial Network" and is considered a critical link in the local economy and county-wide development plans (See **Figure 2.2-1**).

The section of US-31 under study extends from I-196 in Allegan County (City of Holland) to I-96 in Muskegon County (City of Norton Shores) and is approximately 48 km (30 miles) in length. US-31 serves the communities of Holland, Zeeland, West Olive, Grand Haven, Ferrysburg, Spring Lake, Norton Shores, and Fruitport within the study area. The 1997 Average Daily Traffic (ADT) on US-31 varies from 11,500 to 50,000 in the Holland area, from 21,000 to 24,000 in the rural area between Holland and Grand Haven, from 28,000 to 58,500 in the Grand Haven area, and from 33,000 to 37,000 north of M-104 (See **Figure 2.2-2**).

As shown in **Table 2.2-5**, the most recent available crash data for US-31 shows that the accident rates in various urban segments of US-31 (i.e., Holland and Grand Haven) were more than double the average rates for comparable facilities in the Grand Region (eight county area of West Michigan) and in the entire state. Forty-six (46) percent of all accidents occurred within the city limits of Grand Haven, and sixteen (16) percent of all accidents occurred in Holland. Congestion and high commercial traffic (12 percent of daily volume) are two factors contributing to the higher-than-average accident rates on US-31. In its effort to determine which alternative represents the best balance of congestion relief, improved safety, and minimization of impacts, the Michigan Department of Transportation (MDOT) is evaluating the existing and future conditions associated with US-31 and the communities along its route from I-196 to I-96.

The existing and forecasted conditions for the US-31 study area indicate that without increasing the capacity or decreasing travel demand in urban areas and across the Grand River, mobility within Ottawa County will be negatively affected. The purpose of and need for the US-31 Study area is to reduce traffic congestion and improve safety for the traveling public. The purpose of this study is to identify and develop alternatives that will satisfy these needs.

US-31 provides the only structure over the Grand River between Lake Michigan and the 68th Avenue bridge in Eastmanville, a distance of approximately 32 km (20 miles). Recurring instances of mechanical and electrical failures have caused the existing bridge to close improperly, sometimes for hours. (See **Table 2.2-8**.) These failures cause a high degree of vehicular congestion within the entire urban area of Grand Haven, Ferrysburg and Spring Lake. The current incident management

plan detours traffic east to 68th Avenue, a 64-kilometer (40-mile) trip for travelers on US-31. This lengthy detour is inconvenient to commuters and businesses along the US-31 corridor. Those industries in the study area which depend on "Just-In-Time" delivery are affected by bridge malfunctions.

The expected traffic growth on US-31 will degrade the current traffic problems further. Daily traffic volumes are projected to reach 83,000 vehicles at the Grand River bridge in Grand Haven by the year 2020. The existing 6-lane bascule bridge cannot accommodate this volume without continuous periods of congestion. The increased congestion will further affect accident potential and air quality.

In 1990, MDOT prepared a preliminary assessment of conditions within the study area. This report recommended further study of several alternatives for the existing US-31 alignment, and identified the possibility of an alternate by-pass alignment to relieve traffic congestion on existing US-31. The current US-31 Location Design Study was initiated in 1993. In 1994, the environmental portion of the project required for the Draft Environmental Impact Statement (DEIS) was initiated.

In 1994, the project study area south of New Holland Street in Ottawa County was designated as a Metropolitan Planning Organization (MPO). This new MPO, administered by the Macatawa Area Coordinating Council (MACC), incorporates the following jurisdictions: City of Holland, City of Zeeland, and the Townships of Holland, Park, Laketown, Zeeland, and Fillmore. In late 1994, MDOT initiated a Major Investment Study (MIS). The MIS process was mandated under ISTEA as a tool for making better decisions within metropolitan areas. An MIS is required when a high-type highway improvement (such as a freeway) of substantial cost is expected to have a significant effect on capacity, traffic, or the level of service for a metropolitan area. During 1995, the MDOT and the MPO developed appropriate land use, traffic projections, and alternatives for consideration as part of the combined MIS/DEIS process. As a result of these previous actions, as well as through continuous public and agency input, this Draft Environmental Impact Statement (DEIS) has been prepared to evaluate the implementation of improvements to the US-31 corridor within the study area.

Succinctly stated, the purpose of and need for this project is to reduce traffic congestion and improve safety for the traveling public on and in the vicinity of US-31. An expanded statement along with supporting data can be found in Section 2 of this document.

considered in the recommendation of an alternative. Alternative A retains the highest measure of effectiveness for the tested ranges:

- Travel Time Costs varied from $6.00 to $15.67 per vehicle per hour
- Fuel and Operational Costs varied from $0.00 to $0.53/liter ($2.00/gallon) plus $0.247/kilometer ($0.398/mile) operational cost (including both variable and fixed costs)
- Accident Costs varied from 25% to 400% of the average accident cost

Alternative F1/F3 ranks second for the measures of *Net Present Value* and *Rate of Return.* Alternative F1/F3 provides improved travel times and reduced potential for accidents for all US-31 users in the Holland area, and also provides these benefits to the traffic which would utilize a regional bypass around Grand Haven. Alternative F1/F3 retains the second rank in the sensitivity analysis for all the range of values shown above.

The cost-effectiveness analysis shows that one alternative does provide benefit even though it does not meet the purpose and need for the project. The 2020 TSM Alternative, while not providing an acceptable level of service in the design year 2020, does provide some improvement in traffic flow. The combination of a lower construction cost with some improvement in traffic flow during the early years of the study period results in a good measure of effectiveness. Note, however, that the 2020 TSM Alternative does not provide an acceptable level of service in the design year. Numerous intersections, particularly in Grand Haven, would have unacceptable performance (level of service "F") in the 2020 design year.

For the non-freeway alternatives, the cost-effectiveness analysis shows that Alternatives R, P, and P1r would not provide operational benefits which outweigh their corresponding construction and right-of-way costs. The cost to build these alternatives would exceed the benefits provided by these alternatives. These alternative rank as the last three of all the alternatives for all variation of statistical data used in the sensitively analysis. As the cost of accidents was increased, the measures of effectiveness for Alternative R decreased. The declining effectiveness with increasing accident costs shows the higher potential for accidents with Alternative R, particularly with a mix of local agricultural traffic and higher speed regional traffic.

In conclusion, those alternatives providing the benefit of freeway travel to the highest percentage of US-31 travelers have the highest cost-effectiveness. Alternative A, the freeway on existing alignment, provides the benefits of a freeway to all travelers on US-31. Alternatives which include a freeway bypass only provide the freeway benefits of increased travel times and decreased potential for accidents to those who would potentially utilize the bypass. For instance, if only 18 percent of the traffic on US-31 between Holland and Grand Haven would utilize a regional freeway bypass, then the benefit of the freeway facility is provided only to the 18 percent of travelers diverting to the bypass. Those staying on existing US-31 would have some benefit due to the decreased traffic volume, but would not have the travel time and safety benefits of the freeway.

2.2.7 Accident Experience

Between 1991 and 1994, a total of 3,212 accidents occurred on US-31 between I-196 south of Holland and I-96 south of Muskegon. A total of 834 of these accidents were severe, resulting in 1,278 injuries and 14 fatalities. **Table 2.2-5** presents an overview of the total number of accidents from 1991 to 1994 along US-31 between I-196 and I-96. Also shown is the average accident rate for each segment analyzed.

Table 2.2-5
US-31 Accident Analysis (1991-1994)

US-31 Segment	Number of Accidents	Number of Injury Accidents	Number of Fatalities	4-Year Accident Rate (A)	Average Accident Rate (1994)
I-196 to 32nd	186	63	2	302	289 (B)
32nd to 8th	393	122	3	506	436 (C)
8th to James	387	88	0	549	436
James to Quincy	236	73	4	448	436
Quincy to Port Sheldon	183	61	0	231	289
Port Sheldon to M-45	219	60	1	130	289
M-45 to Hayes	223	69	2	153	289
Hayes to M-104	1,263	270	2	671	436
M-104 to I-96	122	28	0	81	119 (D)

(A) - per 100 million vehicle-miles traveled
(B) - MDOT Grand Region (4-lane divided, free-access rural highway)
(C) - MDOT Grand Region (4-lane divided, free-access urban highway)
(D) - MDOT Grand Region (4-lane divided, limited-access rural highway)

PAGE 1 MY PRIORITY #1 #2

The data in **Table 2.2-5** shows that the US-31 corridor has higher-than-average accident rates in both the Holland and Grand Haven areas.

The total number of accidents on each of these segments can be broken down into accident type. Such a breakdown can lend insight into accident patterns which can provide evidence for corrective measures. A breakdown of the four most common accident types (78 percent of all accidents) is shown in **Table 2.2-6**. Also shown in the table is the number of weather-related accidents. The table shows the raw number of each type of accident over the four-year period and the overall percentage of each type of accident for each segment (shown in parentheses).

Table 2.2-1 Existing 1997 Peak-Hour Bi-directional Traffic Volumes		
Location on US-31	**AM-Peak Hour ***	**PM-Peak Hour ****
South of 32nd Street	2,050	2,350
South of 8th Street	2,700	3,400
North of 8th Street	2,900	3,600
South of James Street	2,600	3,600
North of James Street	2,200	2,750
South of M-45	1,400	1,600
North of M-45	1,500	1,600
South of Robbins Road	2,500	2,600
North of Robbins Road	2,800	3,250
South of Jackson Street	3,700	4,350
Grand River Bridge	4,600	5,500
North of M-104	2,700	3,100

PAGE 1 MY PRIORITY #1 #2

* - Morning peak-hour varies from 6:30 - 8:30 A.M.
** - Afternoon peak-hour varies from 3:30 - 6:30 P.M.

A supplemental study was conducted in 1993 at two additional locations: the US-31/Robbins Road intersection and the US-31/M-104 interchange. The purpose of this survey was to determine the level of diversion that could be expected to use a local bypass near Grand Haven. The study revealed that 11 percent of traffic south of Robbins Road (approximately 3,000 vehicles per day in 1997) could potentially bypass the Grand Haven area, having an origin/destination pattern on M-104 east of the Village of Spring Lake. In addition to this traffic south of Robbins Road, some traffic would divert from north of Robbins Road to a local bypass if constructed. In terms of 1997 traffic volumes, there would be a decrease in vehicular demand at the existing Grand River crossing as shown in **Table 2.2-2**. The 1998 study in the Grand Haven area verified the results of the previous studies for the northern portion of the study area.

Table 2.2-2 Demand Volumes on US-31 at the Grand River Crossing			
Year	**No Bypass**	**With a Regional Bypass of Grand Haven**	**With a Local Bypass of Grand Haven**
1997	58,500	51,000	48,000
2020	83,000	69,600	65,600

value of the accumulated costs. The *rate of return* is the amount of benefit received for each $1.00 investment. The higher the rate of return, the more cost effective the alternative would be. A rate of return under $1.00 means the construction costs exceed the benefit provided by the improvement to the traveling public.

Each of the Build alternatives was compared with the No-Action Alternative. The results of the analysis are summarized in **Table 5.13-1**.

TABLE 5.13-1
Comparison of Cost Effectiveness through 2020

Alternative	Net Present Value (Million)	Benefit/ Cost Ratio	Payback Period (years)	Rate of Return
2020 TSM vs. "No Action"	$103	2.01	12	$1.48
Alternative A vs. "No Action"	$978	3.10	9	$2.78
Alternative J1 vs. "No Action"	$256	1.55	15	$1.39
Alternative F1/F3 vs. "No Action"	$461	1.99	12	$1.79
Alternative F/J1 vs. "No Action"	$111	1.24	18	$1.10
Alternative F vs. "No Action"	$46	1.10	20	$0.98
Alternative P1r vs. "No Action"	-$135	0.59	>30	$0.51
Alternative P vs. "No Action"	-$189	0.47	>30	$0.42
Alternative R vs. "No Action"	-$118	0.64	>30	$0.56

While each of the alternatives provides improved traffic operations, all alternatives do not provide equal degrees of benefit as compared to construction cost.

Alternative A has the highest measure of effectiveness in each category. The cost-effectiveness analysis shows that the added expense associated with the right-of-way acquisition and the construction of Alternative A is worth the additional benefit derived from the superior operational characteristics of Alternative A. Alternative A, the freeway on existing alignment, provides improved travel times and reduced potential for accidents to all the users of US-31 (rather than only those who would divert to a bypass under other freeway alternatives). (ZEELAND 18%)

To check the sensitivity of the results to the statistical data used in the analysis, the analysis was repeated for a range of values. The range of values represent some extreme assumptions which can be used to test the validity of the cost-effectiveness analysis. For instance, if increasing the price of gasoline changes to ranking of alternatives, then other impacts and benefits would have to be

5.2.3.3 Summary of Secondary and Cumulative Impacts

Secondary and cumulative impacts are those impacts resulting from the changes in the transportation system as proposed in the various alternatives. The magnitude, extent, duration, and frequency of secondary and cumulative impacts may greatly exceed those impacts directly related to construction of an alternative. In order to compare the impacts for the various alternatives, the following analysis is organized by alternative.

Transportation Systems Management (TSM)

TSM improvements on existing US-31 would marginally change travel times within the corridor. This may tend to retain attractiveness of development near the existing alignment. There would be little to no change in land use, and little to no secondary impacts, as compared to the No-Action Alternative.

Alternative A

The construction of a freeway on the existing alignment tends to increase the attractiveness of development near the existing alignment. This is because improved travel times are realized only for development near the freeway facility. There would be little to no secondary impacts (zero to five percent projected change in land use) as compared to the No-Action Alternative on agricultural land, wetlands, water quality, or fisheries resources under Alternative A. Little change would occur because development which impacts agricultural land or wetlands either has already occurred near the existing highway, or is projected to occur near the existing highway even if no improvements were made. There would be little to no additional impacts on resources listed on page 5-29 from the construction of freeway on existing alignment.

Alternative J1

Alternative J1 would provide a freeway bypass around the Holland and Zeeland area. One hypothesis presented during the public involvement process was that the freeway bypass of Holland and Zeeland would act as a beltway to contain the urban sprawl to the south and west of the freeway bypass. If this were the case, agricultural and natural land to the north and west of the bypass would be protected from secondary development. However, the analysis of the project impact zone based on the travel time model shows that, without enforced zoning regulations, the construction of the bypass would not contain sprawl. In Olive and Blendon Townships alone, the secondary impacts to agricultural land are projected at approximately 47 square kilometers (11,500 acres).

Cumulative impacts would include:

- Additional water quality degradation due to point and nonpoint source discharge in the Macatawa and Pigeon River watersheds.
- Increased habitat loss and diminished flood control capacity from wetland loss in Zeeland Township.
- Effects on cultural sites (including the Boer Farm in Zeeland Township and the Michigan Centennial Farms in Zeeland, Olive and Blendon Townships).

DEPARTMENT OF

ATTORNEY GENERAL

MEMORANDUM

April 14, 2000

Attornev-Client Privilege

TO: Jeffrey R. Saxby
Project Manager
Design Division

FROM: LuAnn Cheyne Frost
Assistant Attorney General
Transportation Division

RE: HIGHWAYS – Approval required of cities and villages before MDOT acquires right-of-way; approval of counties, cities and villages to eliminate intersections; planning commission approvals; miscellaneous approval requirements
Our File No. 98T-166

QUESTIONS

You have raised several questions regarding local governmental unit's authority to approve MDOT projects. You indicated you are aware that cities have "veto" power over a proposed trunkline project and you question whether counties and townships have any similar authority.

SUMMARY RESPONSE

Generally, the legislature intended that units of government cooperate in the construction, maintenance and improvement of highways, roads and streets. The legislature has expressly required MDOT to obtain the consent of cities and villages prior to the taking of any property or property rights within a city or village. A review of the Michigan Constitution, general political subdivision enabling statutes, the general highway laws and the several condemnation acts discloses that there is no similar statute empowering townships and counties with the same authority. However, the approval of counties, cities and villages must be obtained before intersections are eliminated for limited access highways. The only other general local approval which my research uncovered falls under certain municipal planning statutes. It is unclear whether MDOT must comply with them; we recommend that MDOT seek clarifying legislation. However, even if MDOT must seek approval of certain highway projects under those planning statutes, MDOT and the State Transportation Commission may override any local disapproval.

1 OF 8 PAGES

MOA
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Macatawa Area Coordinating Council
A Cooperative Effort Among Units of Government

March 11, 2004

Tom Vanderkuy
784 Holly Creek Drive
Holland, MI 49423-7807

Dear Stakeholder:

You have been identified by the Macatawa Area Coordinating Council (MACC) as a key stakeholder in the transportation system or have expressed a past interest in the MACC's long range transportation planning process. The MACC has been updating its Long Range Transportation Plan (LRP) and has come to a point where public review and comment on components of the LRP are being sought. A major component of the LRP is a proposed list of roadway projects that have been developed to address current and projected future traffic congestion. Other LRP components examine other transportation modes such as transit.

An **open house** will be held at the following time and location:

Tuesday, March 30, 2004

9:00 a.m.- 6:00 p.m.
Macatawa Area Coordinating Council Office
400-136th Avenue, Suite 416

If you are unable to attend, or would prefer to discuss your comments individually, please feel free to contact me at 395-2688 to arrange an appointment.

Hope to see you on March 30!

Sincerely,

Steve Bulthuis
Transportation Program Manager
Macatawa Area Coordinating Council

400-136th Avenue, Suite 416, Holland, Michigan 49424
phone: (616) 395-2688 - *fax*: (616) 395-9411

http://www.macatawa.org/~macc/
email: macc@macatawa.org

RED: Number Of Accidents at Corresponding Intersection
BLUE: Accident Ranking, Top Ten, in Corresponding Year

Just out ↓

ACCIDENT INTERSECTION	1996		1997		1998		1999		2000		2001		2002		2003		2004		Total Accidents per Intersection
Waverly Rd & 16th	37	1	58	1	59	1	66	1	51	1	50	1	72	1	52	1	61	1	61 + 445 = 506
Waverly Rd & M21	31	5	30	3	37	3	34	3	36	4	35	3	36	2	23	7	27	7	262
Waverly Rd & 24th	28	6	22	5	35	5	25	6	25	8	23	4	23	9					181
Waverly Rd & 32nd	16	9							19	9									35
Waverly Total																			**923**
US 31 & Lincoln	37	2	27	4	37	4	33	4	43	2			29	4			30	5	206
US 31 & 32nd	32	4	35	2	38	2	44	2	37	3	36	2	32	3	24	6	35	2	278
US 31 & 24th	19	8			21	8					22	6			21	9	21	10	83
US 31 & 16th			17	7	27	6	19	8			19	9	25	7	37	2	35	2	144
US 31 Total																			**711**
River Ave & 7th			16	10			30	5			22	5	27	5	22	8	28	6	117
River Ave & 8th	24	7	17	7															41
River Ave & 9th									26	6									26
River Ave & 16th					18	9			18	10	18	10							54
River Ave Total																			**238**
Washington Ave & US 31															26	5	[illegible]		26
Washington Ave & Matt Urban							18	9											18
Washington Ave & 40th			21	6	23	7	22	7	34	5	21	7	27	6	29	3	24	8	177
Washington Ave & 32nd	34	3			18	10							25	8	17	10	21	10	94
Washington Ave Total																			**315**
PINE + 7TH																	22	9	
Lincoln & 32nd	15	10																	15
Lincoln & 8th							16	10											16
Columbia & 9th			17	7															17
I 196 & M40									25	7	18	8	21	10	28	4	33	3	92
Miscellaneous Total																			**140**

Top Ten Accident Intersection Totals 2,327